

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

VICTOR LE, on Behalf of Himself and All  
Others Similarly Situated,

Plaintiff,

v.

KOHL'S CORPORATION and KOHL'S  
DEPARTMENT STORES, INC.,

Defendants.

Case No. 2:15-cv-01171-JPS

Judge: Hon. J.P. Stadtmueller  
Courtroom: 471

**PARTIES' JOINT STIPULATION OF DISMISSAL  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 41(a)(1)(A)(ii).**

Pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, Plaintiff Victor Le ("Plaintiff") and Defendants Kohl's Corporation and Kohl's Department Stores, Inc. (collectively, "Defendants"), by and through their undersigned counsel, hereby jointly stipulate to dismiss without prejudice all claims asserted in the above-captioned action against Defendants. All parties who have appeared in this action consent to this dismissal.

Respectfully submitted this 1st day of April, 2016.

Dated: April 1, 2016

/s/ Joseph P. Guglielmo

Joseph P. Guglielmo  
**SCOTT+SCOTT, ATTORNEYS AT LAW, LLP**  
The Chrysler Building  
405 Lexington Avenue, 40th Floor  
New York, NY 10174  
Telephone: 212-223-6444  
Facsimile: 212-223-6334  
jguglielmo@scott-scott.com

Erin Green Comite  
**SCOTT+SCOTT, ATTORNEYS AT LAW, LLP**  
156 South Main Street  
P.O. Box 192  
Colchester, CT 06415  
Telephone: 860-537-5537  
Facsimile: 860-537-4432  
ecomite@scott-scott.com

Joseph Pettigrew (to be admitted)  
**SCOTT+SCOTT, ATTORNEYS AT LAW, LLP**  
707 Broadway, Suite 1000  
San Diego, CA 92101  
Telephone: 619-233-4565  
Facsimile: 619-233-0508  
jpettigrew@scott-scott.com

Jordan C. Loeb  
**CULLEN WESTON PINES & BACH LLP**  
122 West Washington Ave., Ste. 900  
Madison, WI 53703  
Telephone: 608-251-0101  
Facsimile: 608-251-2883  
loeb@cwpb.com

E. Kirk Wood (to be admitted)  
**WOOD LAW FIRM, LLC**  
P. O. Box 382434  
Birmingham, AL 35238-2434  
Telephone: 205-908-4906  
Facsimile: 866-747-3905  
ekirkwood1@bellsouth.net

*Counsel for Plaintiff Victor Le and the Proposed Class*

Dated: April 1, 2016

/s/ James F. Speyer  
James F. Speyer  
Alex Beroukhim  
**ARNOLD & PORTER LLP**  
777 S Figueroa Street, 44th Floor  
Los Angeles, CA 90017  
Telephone: 213-243-4000  
Facsimile: 213-243-4199  
james.speyer@aporter.com  
alex.beroukhim@aporter.com

John L. Kirtley  
**GODFREY & KAHN SC**  
780 N Water Street  
Milwaukee, WI 53202-3590  
Telephone: 414-273-3500  
Facsimile: 414-273-5198  
jkirtley@gklaw.com

*Counsel for Defendants Kohl's Corporation and  
Kohl's Department Stores, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 1, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List, and I hereby certify that I caused the foregoing document or paper to be mailed via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List

I certify under penalty of perjury that the foregoing is true and correct.

Executed on April 1, 2016.

/s/ Joseph P. Guglielmo

Joseph P. Guglielmo

**SCOTT+SCOTT, ATTORNEYS AT LAW, LLP**

The Chrysler Building

405 Lexington Avenue, 40th Floor

New York, NY 10174

Telephone: 212-223-6444

Facsimile: 212-223-6334

jguglielmo@scott-scott.com